

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, as assignee of individuals who are Covered Persons, JANE DOE-1, a law enforcement officer, JANE DOE-2, a law enforcement officer, PATRICK COLLIGAN and PETER ANDREYEV	: Civ. No. 1:25-cv-00237-HB
Plaintiffs,	: DEFENDANT PEOPLEWHIZ, INC.'S SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION TO DISMISS PLAINTIFFS' COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(2)
v.	: :
PEOPLEWHIZ, INC., RICHARD ROES 1- 10, fictitious names of unknown individuals and ABC COMPANIES 1-10, fictitious names of unknown entities,	: :
Defendants.	: :

Supplemental Brief of Defendant PeopleWhiz's Inc. In Support of Motion to Dismiss

Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(b)(2)

This supplemental brief is submitted in accordance with the Court's January 27, 2025, order (Doc. 11), and in support of the consolidated motion to dismiss for lack of personal jurisdiction filed collectively by the Defendants in the related action: Atlas Data Privacy Corp, et al. v. GoHunt LLC, et al., Case No. 1:24-cv-04380-HB ("Defendants' Motion").

PeopleWhiz is a California corporation, with its principal place of business in California. Declaration of Cyrus Zahabian, ¶ 2. PeopleWhiz operates a website, accessible from anywhere in the United States, that offers background search services to web users. *Id.* at ¶ 3. PeopleWhiz's background search services allows users and subscribers of the PeopleWhiz site to obtain public record reports on individuals located within the United States. *Id.* PeopleWhiz operates this website from its principal place of business in California. *Id.*

PeopleWhiz does not have any sort of presence in the state of New Jersey. *Id.* at ¶ 4. It does not have any employees or physical offices in New Jersey. And PeopleWhiz does not do anything on its website to specifically target its services towards the residents of New Jersey, as opposed to the residents of the other 49 states in this country.

Simply put, there is no basis upon which Plaintiffs may assert that this Court may exercise either general or specific personal jurisdiction over PeopleWhiz. Accordingly, for the reasons detailed in Defendants' Motion, this Court lacks personal jurisdiction over PeopleWhiz, and the Court should therefore dismiss Plaintiffs' complaint against PeopleWhiz pursuant to Fed. R. Civ. P. 12(b)(2).

Dated: March 18, 2025

Respectfully submitted,

/s/ John E. Brigandi

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